

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

**MISTY BLANCHETTE PORTER,
M.D.,**

Plaintiff,

v.

**DARTMOUTH-HITCHCOCK
MEDICAL CENTER,
DARTMOUTH-HITCHCOCK
CLINIC, MARY HITCHCOCK
MEMORIAL HOSPITAL, and
DARTMOUTH-HITCHCOCK
HEALTH,**

Defendants.

Docket No. 2:17-CV-194

**PLAINTIFF'S REPLY MEMORANDUM IN SUPPORT OF HER
MOTION TO AMEND JUDGMENT**

Plaintiff Misty Blanchette Porter, M.D. (“Dr. Porter” or “Plaintiff”) submits this reply memorandum to respond briefly to Defendants’ Opposition to Plaintiff’s Motion to Amend Judgment (Doc. 306). Defendants argue that Dr. Porter “seeks to relitigate a number of issues” and seeks “multiple forms of relief that are plainly not available to her.” (*Id.* at 1).

Dr. Porter does not seek to relitigate any issue, and the relief she seeks is clearly authorized by applicable law. Dr. Porter’s motion simply seeks to have the Court amend the judgment in this case to include (1) prejudgment interest, (2) post-judgment interest at the Vermont statutory rate of 12% per annum, (3) an award of costs, and (4) an award of attorneys’ fees. These are all proper issues for post-trial motions and they reflect proper elements of recovery for a successful plaintiff. The substantive bases for Dr. Porter’s requests for interest, cost, and fees are set forth in her Motion for Pre-Judgment Interest (Doc. 296), her Bill of Costs (Doc. 300), and her Motion for Attorneys’ Fees (Doc. 301). In addition, her arguments for

awarding post-judgment interest at the Vermont statutory rate of 12% are set forth in her Motion to Amend Judgment (Doc. 302). For the reasons set forth in all these pending motions, Dr. Porter asks the Court to grant her motion and amend the judgment to include all of the relief to which she is entitled.

CONCLUSION

For the foregoing reasons, and for all the reasons set forth in her initial motion papers, Dr. Porter requests that the Court GRANT her Motion to Amend Judgment (Doc. 302).

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